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Application GRANTED. Plaintiffs' motion to strike this application (Dkt. No. 12) is DENIED.

July 24, 2020

**VIA ECF**

Hon. Lorna G. Schofield, U.S.D.J.  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

RE: *Watson, et al. v. Lexus of Manhattan*  
Civil Action No. 1:20-cv-04572 (LGS)

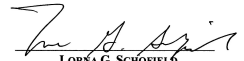
Defendant shall file an answer or otherwise respond to the Complaint by **August 21, 2020**. The initial pretrial conference ("IPTC") scheduled for August 13, 2020, is adjourned to **August 20, 2020, at 10:50 a.m.** Defense counsel shall file a notice of appearance as soon as possible and no later than **August 13, 2020**. The parties are advised that the joint pre-conference materials are due seven days before the IPTC, or by **August 13, 2020**.

The Clerk of Court is respectfully directed to close Dkt. Nos. 11, 12. So Ordered.

Dear Judge Schofield:

Dated: July 27, 2020

New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

This office serves as outside general counsel to Lexus of Manhattan, the defendant in the above-referenced matter. We are advised that plaintiffs, Brian Watson and Daniel Samarghitan (collectively, "Plaintiffs"), filed a class action complaint and a Motion for Entry of Default. As Defendant's insurance carrier is still reviewing the claim and has not yet formalized the assignment, we respectfully request a thirty-day (30) extension of time to prepare opposition to Plaintiffs' Request for Default and to answer, move or otherwise respond to the class action complaint. In light of same, we also respectfully request an adjournment of the initial pre-trial telephonic conference currently scheduled before Your Honor on August 13, 2020.

Defendant has not made any prior requests for an adjournment or extension in the matter. We contacted plaintiffs' counsel to discuss the matter and to request consent for an adjournment; counsel, however, declined to extend the professional courtesy. Notably, counsel initially agreed to stipulate to vacating the default, but has since retracted his consent.

We thank the Court for its attention to this matter.

Respectfully submitted,

**STEVENS & LEE, P.C.**

s/ Salvatore A. Giampiccolo  
SALVATORE A. GIAMPICCOLO

cc: All Counsel of Record (via ECF)